

Card comments on the Change packages:

1) Overriding assumptions that the amount of work is finite – such as:

- Finite # of dollars available
- Finite # of highly trained contract workers
- Finite amount of contaminated groundwater
- Permits with finite terms
- Secondary assumption that work can be characterized and prioritized – What appears to be infinite is the time available to mitigate the problem. No way to realistically estimate how long mitigation will take. The decision making process supports extending time.

2)

- Need more context about the TPA – what is it, how to read a milestone – major and interim with examples for the proposed new milestones for the 324, 618-11 and 300-296 explaining how they weren't originally in the TPA and what a new interim milestone looks like.
- Concerns about presupposing cleanup remedies and how that impacts the ability of public input to change and influence cleanup decisions that haven't been made yet.
- Setting context about more generally what drives cleanup and explaining what is meant by cleanup in this context mostly document due dates and then sharing the impact on the actual removal/remediation work.

3) Don Bouchey

- Why does it take 10 years for M-15 to study and characterize before actually continuing to accomplish actual work?
- Why not roll over the PFP team to process some of the Central Plateau waste?
- Why not keep achieving progress with experienced personnel while performing required characterization?
- Milestones should not include a TBD. (Mike Korenko's suggestion is good)

4) Mike Korenko

- M-16 : Split into 2 majors – M-016A and M-016B
- M-16A – Keep date as 9/30/2024 but the milestone is a submit date for a complete cleanup on the Central Plateau
- M-016B- Complete cleanup on the Central Plateau TBD by M-016A
- Consider a third milestone with an estimated date, non enforceable.

5) Richard Bloom

- Canyon delay will likely imply that TRU waste will be generated past 2030 (WIPP closure date)
- What is the vision for TRU waste disposal post 2030?

6) WESF – It was a scary slide and someone said we should be commenting on priorities. How do we comment on WESF's importance? (Dry Cask Storage)

7) Tom Galioto (sp?)

- Issue a public document with detailed work packages that were developed to support these changes,

including scope/schedule/cost estimates.

- Provide a brief one or two paragraph explanation on the Fact Sheet Summary and on the Milestone Change Forms as to why each milestone is being delayed as shown.
- Eliminate the TBD for Major Milestones M-016 and instead provide your informed date estimate based on the detail that has gone into this change package effort. Document any assumptions you make in defining this date.

8) Eliminate TBD for M-16 by using some estimated steps with reasonable completion dates and final step as a TBD.

9)

- DOE and contractors are driven towards bias for action, rather than doing the best approach for remediation, based on near-term milestone dates. Doing something with insufficient understanding frequently tends towards excessive time, cost and risk that could have been avoided if milestones wouldn't be forced for early time frames.
- The Central Plateau problems are most complex ever faced. We do not know enough to even proposed how to remediate the sites so DOE is absolutely responsible and prudent in their decision to allow the M-15 milestone work drive the deadlines for M-16. This is the only way this high risk site will be remediated correctly, most efficiently, effectively and responsibly for long-term stewardship.

10)

- M-016, New date – While using the outcomes of RODs and RD/RA Work Plans may lead to completed cleanup programs at other sites, DOE has demonstrated at Hanford that if there is not a completion date for the milestones then actions that do not have a date often get overshadowed by other activities.
- Missing a milestone is a proven process for completing work. What substitutes (having) the date to keep other activities from becoming a priority for M- 016 cleanup? Describe how M-15 relates to M-016? For example, does M-15 result in the RODs that drive M-016? If this was clear, then understanding the schedule and enforcement of M-016 makes sense through the CERCLA process.
- Summary of milestones – There are five major milestones and all of the related milestones are interim. Could you provide a list that indicates the major and related interim milestones?

11)

- How will TBD influence budget priorities? If TBD is used instead of a concrete/tangible date, will Congress take this as a reason not to allocate funding, or continue to cut funding for cleanup?
- Why are these changes being made?
- Do these changes increase risk to human health and the environment?

Without a set date:

- Agencies are not held accountable
- contractors are not held accountable
- the likelihood of further delays increases
- agencies look incompetent and continue to lose public trust

Additionally:

- If you push out M-15 by ten years, wouldn't the math say you would push out M-16 by ten year to 2034?
- Can I have the full details of the 30 unchanged, 19 new and 9 extended and 6 modified milestones? And....Can I have these details in enough time to educate the public and encourage turnout?

12)

- With PFP completion we have expected 120 million to be freed up for Central Plateau milestones. Now funding is being used as a justification for deferring Central Plateau Milestones – some indefinitely. Why isn't a significant portion of that 120 million per year being allocated to M-15, M-16, M-37?
- Show the specifics of where funds are to be reallocated for 2017-19, 2019-2022.
- Provide detail of how budget allocations would change from what was provided for review and comment for 2017-222 this spring including why funds for these milestones need to be reallocated.
- You need to have a presentation which describes the violation and closure orders for CWC units and how these changes relate to delays for removal of wastes. Why is there no firm closure date?
- TPA change Fact Sheet is woefully inadequate for public notice and explanations – Links not connected to the milestones! and no mention of hearing dates.

13)

- Need a summary of each milestone to be changed.
- A time line showing milestones by times and waste sites
- Need milestones and unchanged milestones. Show the logic of work.
- It would be helpful to have a map of the Hanford Site showing waste sited in question.
- What are our options? The site has limited budgets and limited information on waste sites. What can we do but push the milestones out?
- Focus on Risk to the environment and public
- Focus on 300 Area remaining actions first, due to risks to river and public
- Actions on Central Plateau can be delayed due to distance from the river – it buys us time.